

DAIRY RESEARCH, INC.

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June 22, 1971

Hearing Clerk
Department of Health, Education & Welfare
Room 6-62
5600 Fishers Lane
Rockville, Maryland 20852

Re: FR Doc. 71-8272
FDA (21 CFR Part 3)
Ingredient Statements:
Oils and Fats

Dear Sirs:

Commissioner Edwards has asserted that the purpose of this proposed change is "...to help consumers...(that) FDA is not recommending changes in American dietary habits."

I would strongly urge that the validity of the Commissioner's position be tested by unbiased consumer research.

I am quite certain that such research will clearly establish that the consumer perception of the ingredient statements will be such that the proposed changes will constitute a flagrant misbranding of products!

Our pilot research has shown:

1. That the consumer perceives that the label identification of oils and fats is indicative that FDA has established a difference in the health and nutrition values,
2. That the consumer is aware that corn oil and vegetable oils are "high in polyunsaturated fats;" that the intent of FDA must be, therefore, to encourage use of products containing such oils and fats to the exclusion or minimization of use of animal source fats,
3. That statements as to degree of hydrogenation only further confuse the consumer; that there is no comprehension that such processing can change unsaturated fats into partially saturated fats.

The consumer perception of FDA's intent appears to have been somewhat validated by press stories suggesting that FDA feels that "the weight of medical opinion" favors predisposing the consumer to greater use of vegetable oils even in the absence of clinical data.

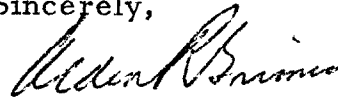
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FDA should perhaps be reminded that the "weight of medical opinion" also favored bleeding the patient as a cure-all not too many years ago! Ignorance is not a characteristic peculiar to consumers.

My personal bias is evident in the letterhead. But I am not urging acceptance of my position. I am asking for an objective research study of consumer understanding and perception of the proposed label requirement.

FDA cannot act intelligently without such data to guide its decision. The research is inexpensive enough so that there should be no problem in financing it.

Sincerely,



Alden R. Grimes
Vice President

ARG:lm